

Ken McLaughlin

From: Garfield Goodrum <garfield.goodrum@GDRMLAW.NET>
Sent: Thursday, February 20, 2020 7:59 AM
To: Ken McLaughlin
Cc: Chris Sylvain; Hunter Kappel; docketing
Subject: RE: ECP v Countryview et al

Follow Up Flag: Flag for follow up
Flag Status: Completed

Noted. Lets reserve 4/1 for Leavit, although he's on travel 4/2-3. Could you start 3/30 afternoon to be safe? Still working on Wehrli.

Sent via the Samsung Galaxy Note10+, an AT&T 5G Evolution capable smartphone

----- Original message -----

From: Ken McLaughlin <kmclaughlin@ma-lawpc.com>
Date: 2/18/20 11:41 AM (GMT-05:00)
To: Garfield Goodrum <garfield.goodrum@GDRMLAW.NET>
Cc: Chris Sylvain <chris.sylvain@GDRMLAW.NET>, Hunter Kappel <Hunter.Kappel@GDRMLAW.NET>, docketing <docketing@GDRMLAW.NET>
Subject: RE: ECP v Countryview et al

My office is in Aurora, not Oswego. Please note our new address.

4/1-3 are currently good. Let me know the date so that I can set it. I would like to avoid the week of the April 6th as it is the week heading into Easter, and I may be off that week.

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From: Garfield Goodrum <garfield.goodrum@GDRMLAW.NET>
Sent: Tuesday, February 18, 2020 10:24 AM
To: Ken McLaughlin <kmclaughlin@ma-lawpc.com>
Cc: Chris Sylvain <chris.sylvain@GDRMLAW.NET>; Hunter Kappel <Hunter.Kappel@GDRMLAW.NET>; docketing <docketing@GDRMLAW.NET>
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Thanks, Ken. Let's do the Demiduks on 3/23-24, and no problem on your court schedule. If we need to go over to 3/25, let's block that morning, too. I'll come to your Oswego. No problem on the telephone of Mr. Leavitt, but I will be in Bedford / Roanoke for that, so what looks good week of 3/30 and 4/6? Still working on Wehrli. Garfield

Garfield Goodrum, Esq.

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From: Ken McLaughlin <kmclaughlin@ma-lawpc.com>
Sent: Tuesday, February 18, 2020 11:10 AM
To: Garfield Goodrum <garfield.goodrum@GDRMLAW.NET>
Cc: Chris Sylvain <chris.sylvain@GDRMLAW.NET>; Hunter Kappel <Hunter.Kappel@GDRMLAW.NET>; docketing <docketing@GDRMLAW.NET>
Subject: RE: ECP v Countryview et al

Garfield,

March 23-24 are available for their depositions. On March 24th, I have court in the morning, so on that day, we would have to start a little later, perhaps 11 am CST. I propose blocking both days and doing all three party depositions. We can do them in my office if you are coming to Illinois. For Jim Leavitt's deposition, I would like to do it by telephone deposition with him at a court reporter's office in Virginia, unless he plans to come to Illinois. Exhibits would be provided electronically and delivered to the court reporter. Please let me know his plans so that I can plan accordingly.

Thanks,

Ken

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From: Garfield Goodrum <garfield.goodrum@GDRMLAW.NET>
Sent: Monday, February 17, 2020 9:35 AM
To: Ken McLaughlin <kmclaughlin@ma-lawpc.com>
Cc: Chris Sylvain <chris.sylvain@GDRMLAW.NET>; Hunter Kappel <Hunter.Kappel@GDRMLAW.NET>; docketing <docketing@GDRMLAW.NET>
Subject: ECP v Countryview et al

Ken, Attached please find the executed certification of Mr. Leavitt. He is available 3/2-6, 3/9-10 and 3/23-24 for deposition. Please let me know some dates for the Demiduks. Please also let me know any blocked dates you have, so I can line up Wehrli. Note, I am unavailable 3/11-20. Thanks, Garfield

Garfield Goodrum, Esq.

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